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8 || Class Counsel

ADTRADER, INC.,

Plaintiff,

V.

GOOGLE LLC.

Defendant.

Case No. 5:17-CV-07082-BLF

[PROPOSED] FINAL JUDGMENT

Judge: Hon. Beth L. Freeman
Courtroom: 3

1 **[PROPOSED] FINAL JUDGMENT**

2 For the reasons set forth in this Court's Final Approval Order, in the above-captioned
3 matter as to the following class of persons:

4 All persons or entities Google's records indicate had an AdWords Account between
5 December 13, 2013 and the date of the last signature to this Agreement below, and: (1)
6 whose Google AdWords advertiser account was subject to the Google Inc. Advertising
7 Program Terms for the United States (the "Terms"); (2) who are not subject to the
8 arbitration clause in the Terms; (3) who were charged by Google through their AdWords
9 account for clicks or impressions on advertisements appearing on any DoubleClick Ad
10 Exchange ("AdX") publisher website at any time between December 13, 2013 and the
11 date of the last signature to this Agreement below; and (4) who Plaintiffs alleged in this
12 Action did not receive refunds or credits from Google even though it withheld payment to
13 that publisher for those clicks or impressions in connection with any invalid activity or
14 any breach of contract, including any policy violation,

15 **JUDGMENT IS HEREBY ENTERED**, pursuant to Federal Rule of Civil Procedure 58,
16 as to Plaintiff Specialized Collections Bureau, Inc. ("Plaintiff"); the above-specified class; and
17 Defendant Google LLC (Google) on the terms and conditions of the Class Action Settlement
18 Agreement (the Settlement Agreement or Settlement) approved by the Court's Final Approval
19 Order, dated May 17, 2022.

20 1. The Court, for purposes of this Final Judgment, adopts the terms and definitions
21 set forth in the Settlement Agreement incorporated into the Final Approval Order.

22 2. Upon the Effective Date of the Settlement Agreement, all Released Claims of the
23 Releasing Named Plaintiff and Releasing Class Members are hereby released as against the
24 Releasees, as defined in the Settlement Agreement; *provided, however,* that those Settlement
25 Class Members identified on the Exclusion List attached as Exhibit A hereto are excluded from
26 the Releasing Class Members, having timely opted-out or excluded themselves from the
27 Settlement, such that they are not deemed to have Released Claims under the Settlement or this
28 Judgment.

29 3. The claims of Plaintiff and the Settlement Class are dismissed on the merits and
30 with prejudice in accordance with the Court's Final Approval Order.

4. The Parties shall bear their own attorneys' fees, costs, and expenses, except as otherwise set forth in the Final Approval Order or any separate Order(s) on or related to Plaintiff's Motion for Service Awards, Attorneys' Fees, and Costs and Expenses.

5. This document constitutes a final judgment and separate document for purposes of Federal Rule of Civil Procedure 58(a).

6. The Court finds, pursuant to Rule 54(a) of the Federal Rules of Civil Procedure, that this Final Judgment should be entered forthwith. Accordingly, the Clerk is hereby directed to enter this Final Judgment.

IT IS SO ADJUDGED AND ORDERED.

JUDGMENT ENTERED this day of _____, 2022.

HON. BETH LABSON FREEMAN
United States District Judge

Exhibit A

NAME

SCOTTY ZINIFIRE
ERIN VANORDEN
TONY ESCOBAR
BUY MORE
RANDY KIESEL
GARRETT MOON
WILLIE TINGLER
BEVERLY LYLES, NATURAL RECOVERY, INC.
GODFREY LAMAR FLEMING
FENLEY LAMOTHE
NEW WORLD COMMERCE
LAURIE MARIN GARCIA
MARIA OSHAUGHNESSY
JESSE KRAUSE
ROBERT HERRERA
LOUIS J FALA
DAWN GUINEY
ANSHULA RUDHRARAJU
GERALD WAGNER
ED BEAUVAIS
CHRISTIAN J PERI
LUCINDA K UTESCH
SHAHNAWAZ SURANI
KANWARPREET SINGH
KEVIN WHITNEY
GARY SCHMINKE
BORIS SIEGEL
ARTHUR MEACHAM
DANUTA TOBOLA
AMIN BAGHERI
DOROTHY GIBSON
ROHIT KESHWANI
WHOLESALE OR ALOHA WHOLESALE DEANDREA FORD
NATHAN COOK

JOHN OBERHOLTZER

KELLEY DIEHL

EUGENE NYFFLER

LEIGHTON GARCIA

ELAINE S WATERS

STATELINE IRRIGATION SUPPLY INC BONNIE E RODGERS

ERIKA J CARDENAS

OKORAFOR IKEAGWU

FEN LAMOTHE

CHABELLI HERNANDEZ

KAREN SCOTT

FLOWERS BY ROBIN LLC

RODRIGO ZANCANARO

TIM STAMBAUGH

ANDREW NENORTAS

RODNEY DI MERCURLO

ALLISON DUMITRIU CARCOANA BEE SAFE

MAYO CLINIC